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November 4, 2008

VIA ECFS

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

FILED/ACCEPTED
NOV - 4 2008
Federal Communications Commission
Office of the Secretary

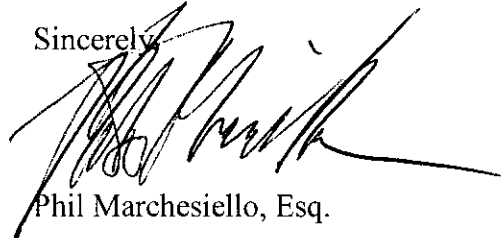
Re: **EB Docket 06-36**
Annual 47 C.F.R. § 64.2009(e) CPNI Certification
Interface Security Systems Holdings, Inc.

Dear Ms. Dortch:

On behalf of Interface Security Systems Holdings, Inc. ("Interface"), please find attached hereto Interface's customer proprietary network information ("CPNI") compliance certification and accompanying statement for filing in the above-referenced docket. Interface is in the process of its initial deployment of service to the public and has established CPNI operating procedures to govern its compliance with the Federal Communications Commission's CPNI rules.

Please do not hesitate to contact the undersigned with any questions regarding this matter.

Sincerely,



Phil Marchesiello, Esq.

Enclosures

cc: Enforcement Bureau, FCC
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ANNUAL 47 C.F.R. § 64.2009(E) CPNI CERTIFICATION

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: November 4, 2008

Name of company covered by this certification: Interface Security Systems Holdings, Inc.

Form 499 Filer ID: 827355

Name of signatory: Dan Reynolds

Title of signatory: VP of Customer Operations

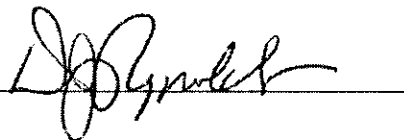
I, Dan Reynolds, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq. The company is in the process of its initial deployment of service to the public and therefore has established the attached CPNI operating procedures to govern its compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures will ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company is in the process of its initial deployment of service to the public and, thus, has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

Because the company is in the process of its initial deployment of service to the public, it has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



CPNI POLICY STATEMENT

1. Interface Security Systems Holdings, Inc. (the "Company") uses or discloses customer proprietary network information ("CPNI") solely for the purpose of providing voice over internet protocol ("VoIP") services to which customers have subscribed. Specifically, the Company uses CPNI to initiate and provide VoIP services and to bill and collect payment for such services.
2. The Company may use, disclose or permit access to CPNI (i) to protect its rights or property, or to protect customers and other carriers from fraudulent, abusive, or unlawful use to the services, (ii) pursuant to a valid request from law enforcement, the federal judiciary or other appropriate governmental authority (CPNI will only be disclosed after the requesting party demonstrates that the request is made pursuant to a valid subpoena, court order, search warrant or letter from a national security agency) or (iii) upon receipt of express customer approval to release or disclose the customer's CPNI to a third party. The Company maintains records of all instances where CPNI was disclosed for any of the foregoing reasons and maintains such records for one year.
3. The Company does not use or disclose CPNI to market any services, regardless of whether customer consent is required for such marketing activities. In addition, the Company does not use or disclose CPNI for any other purpose for which customer consent is required. Because the Company does not use or disclose CPNI for sales or marketing purposes, it is not required to maintain records as specified in Section 64.2009(b) of the FCC's rules.
4. The Company enters into contractual arrangements with its business customers pursuant to which it provides a dedicated account representative to each business customer, such that business customers are not required to contact the Company's call center to reach a customer service representative. The Company's contracts with its business customers also address expressly the Company's protection of the business customers' CPNI.
5. Prior to disclosing any CPNI, the Company authenticates its non-business customers in accordance with the FCC's rules. Specifically, the Company requires its customers to establish an account password and shared secret at the time service is initiated. Neither the password nor the shared secret may be based upon readily available biographical information, *e.g.*, social security number, mother's maiden name, etc.
6. The Company does not release any call detail information to customers during a customer-initiated telephone call except to the extent (i) the customer provides the Company with a pre-established password or, if the customer has forgotten his password, provides the Company with a correct response to a shared secret; (ii) the customer has requested the Company to send call detail information to the customer's address of record; or (iii) the Company first places a return call to the customer's telephone number of record.
7. The Company does not release any call detail information over the Internet unless a customer provides a valid password. In addition, the Company locks a customer account if a user

attempts to access an account without the appropriate password three times in a single session.

8. The Company does not release CPNI at any retail location.
9. The Company notifies customers via mail to the customer's address of record whenever an address or telephone number of record is changed, or whenever a password, online account, or customer response to a shared secret is created or modified.
10. The Company trains its employees with respect to the FCC's rules governing CPNI and as to when employees may or may not disclose CPNI. Violation of the Company's CPNI policies may result in disciplinary action, up to and including termination of employment.
11. The Company has implemented procedures to ensure that the United States Secret Service and the Federal Bureau of Investigation are notified of breaches of CPNI as soon as practicable and in no event later than seven days after the Company determines that a breach has occurred. In the event of a breach, the Company will maintain appropriate records in accordance with FCC rules.

**Federal Communications Commission**

**The FCC Acknowledges Receipt of Comments From ...
Interface Security Systems Holdings, Inc.
...and Thank You for Your Comments**

Your Confirmation Number is: '2008114455220 '

Date Received: Nov 4 2008

Docket: 06-36

Number of Files Transmitted: 1

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